## U.S. Department of Justice Washington, DC 20530

Exhibit A OMB No. 1105-0003
To Registration Statement
Under the Foreign Agents Registration Act of 1938, as amended

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently.

Name and address of registrant		2. Registration No						
Hogan & Hartson		2244						
Washington, D.C. 20004		2244						
3. Name of foreign principal	4. Principal address of foreign principal 712 Fifth Avenue							
Grand Metrpolitan Incorporated	New York, N.Y. 10019 USA							
5. Indicate whether your foreign principal is one of the follo	owing type:							
☐ Foreign government								
☐ Foreign political party								
☐ Foreign or ☎ domestic organization: If either, check of	ne of the following:							
☐ Partnership	□ Committee							
□ Corporation	☐ Voluntary group	p <sup>.</sup>						
☐ Association	Other (specify)							
☐ Individual—State his nationality								
6. If the foreign principal is a foreign government, state:								
a) Branch or agency represented by the registrant.								
b) Name and title of official with whom registrant deals.		N/A						
b) Name and the of official with whom registrant decis.	•							
	Single Si							
7. If the foreign principal is a foreign political party, state:		A Training of the Control of the Con						
7. If the total principal is a consider to a consideration to a	* <							
a) Principal address	$\overline{\circ}$	- Y <u>0</u> 						
	18 03 32	N/A 5						

- 8. If the foreign principal is not a foreign government or a foreign political party,
  - a) State the nature of the business or activity of this foreign principal Grand Metropolitan Incorporated is a wholly-owned US subsidiary of Grand Metropolitan PIC, a British holding company. Grand Metropolitan Incorporated specializes in branded consumer businesses, especially consumer products, including foods, drinks, restaurants, and eyewear.
  - b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal	Yes 🖾	No □
Directed by a foreign government, foreign political party, or other foreign principal	Yes Ø	No □
Controlled by a foreign government, foreign political party, or other foreign principal	Yes 🛭	No □
Financed by a foreign government, foreign political party, or other foreign principal	Yes 😡	No □
Subsidized in whole by a foreign government, foreign political party, or other foreign principal	Yes □	No 😡
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes □	No 💀

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)
Grand Metopolitan Incorporated is wholly—owned by Grand Metropolitan PIC which is a publicly traded company in the UK. We therefore assume that many foreign nationals own stock in the Company. The Board of Directors is composed primarily of foreign nationals.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

Date of Exhibit A Name and Title Signature

May 18, 1993 W. Michael House, Partner C. -m//kee

## U.S. Department of Justice Washington, DC 20530

Exhibit B

To Registration Statement

OMB No. 103-0007 Approval Expires Nov. 30, 1993

Under the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Name of Registrant

Name of Foreign Principal

Hogan & Hartson

Grand Metropolitan Incorporated

## Check Appropriate Boxes:

- 1. The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
- 2xxThere is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 3. The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The registrant will advise and represent the foreign principal in connection with, but not limited to, current legislative and regulatory developments affecting the foreign principal.

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See item 4 above.

- 6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
  Yes ☑ No □
- If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The registrant's activities on behalf of the foreign principal occassionally may include communications with Executive Branch Officials with officials of U.S. Government agencies, and with members of the U.S. Congress and their staff relating to legislation and actions of the Executive Branch and of U.S. Government agencies that may affect or relate to the interests of the foreign principal, including without limitation U.S. laws, regulations, and policies relating to the business of Grand Metropolitan Incorporated.

Date of Exhibit B

Name and Title

Signature

May 18, 1993

W. Michael House Partner

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Political activity as defined in Section I(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign politics of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.